

RECEIVED

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION  
2005 OCT 24 A 9:40

CHARLES ANTHONY KEGLER,  
AIS # 127802 Plaintiff,

VS.

CIVIL ACTION NO:  
2:05-CV-619-F- (WO)

WARDEN G. MOSLEY, et al.,  
Defendant's,

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW, ~~ANTHONY CHARLES KEGLER~~, Plaintiff, proceeding pro-Se, in the above styled Cause, and would respectfully file this the Plaintiff's, Second Request for Production of Documents, upon PERSONS WHO ARE NOT PARTY TO THIS ACTION.

Plaintiff files this REQUEST FOR PRODUCTION OF DOCUMENTS pursuant to RULE 34 (c) F.R.CIV.P.: " A PERSON NOT PARTY TO THIS ACTION MAY BE COMPELLED TO PRODUCE DOCUMENTS AND THINGS OR SUBMIT TO AN INSPECTION AS PROVIDED IN RULE 45 F.R.CIV.P.

You are requested to submit a Response to this Request within 30 Days after receipt of said Request UNLESS otherwise so directed by the Court.

If you Object to any said Request, Please state your Objection in writing.

If you do not have a certain Document, please list, the person(s) and Address(es) of persons having access to said Document(s).

This request for Production of Documents is made towards: ALABAMA DEPARTMENT OF ENVIROMENTAL MANAGEMENT, whose address is: POST OFFICE BOX 301463, 1400 Coliseum BLVD., Montgomery, Alabama 36110-2059. GROUND SOURCE SECTION, DRINKING WATER BRANCH.

1. Please provide a Certified Copy of the Permit for WATER WELL # 4, which the City of CLIO, ALABAMA, has previously averred, is the Well that supplies Water to EASTERLING CORRECTIONAL FACILITY.
2. Please provide Documented Proof, of the Date that any Official from the ALABAMA DEPARTMENT OF ENVIROMENTAL MANAGEMENT OFFICE and or the ENVIROMENTAL PROTECTION AGENCY actually came in person to the EASTERLING CORRECTIONAL FACILITY and took Water Samples from the Sinks and Showers of the Dormitories, located within the EASTERLING CORRECTIONAL FACILITY COMPOUND, as per TITLE 22 Section ~~23-39~~<sup>23-39</sup>, CODE OF ALABAMA, 1975.
3. Please provide a Certified Copy of the Permit for the Water Tank (Tower) that is presently on the ALABAMA DEPARTMENT OF CORRECTIONS PROPERTY ( EASTERLING CORRECTIONAL FACILITY PROPERTY, located approximately 200-300 Feet from the EASTERLING CORRECTIONAL FACILITY PRISON FENCES.
4. Please provide documented proof, of the Last Date the same Water Tank ( Tower) which is located on A.D.O.C. EASTERLING CORRECTIONAL FACILITY PROPERTY was tested, and the Results from those same Tests.
5. Please provide Dopcumented Proof, of exactly how many Residences and or Businesses in the City of CLIO, ALABAMA, receive Water Billings from the same Well # 4, that EASTERLING CORRECTIONAL FACILITY receives it's Water Supply from?
6. Please Provide a copy of the Billing for the amount of Gallons of water Pumped and used by EATSRELING CORRECTIONAL FACILITY FROM WATER WELL # 4 from the Year 2000, to 2005.

7. Please provide a Certified Copy of the Permit for the Water Tank ( Tower) that is located on A.D.O.C. ( EASTERLING CORRECTIONAL FACILITY Property.

8. Please provide a Certified Copy of the Last Inspection Report of the same said Water Tank ( Tower) located on the A.D.O.C. ( EASTERLING CORRECTIONAL FACILITY PROPERTY., for the previous last Five (5) years and up to date.

9. Please provide a copy of any and all letters or Complaint's from Prisoner's Located at the Easterling Correctional Facility, for the previous Five (5) Years and up to date, concerning the Water that is supplied at the EASTERLING CORRECTIONAL FACILITY.

10. Please provide a copy of any dates that ADEM has had to conduct Physical or Personal Inspection of the water Pipes, that are located on the A.D.O.C. EASTERLING CORRECTIONAL FACILITY property, or has had to do repair work on said pipes.

11. Please provide a copy of the Dates, that either ADEM or the EPA has conducted a personal examination of the WATER TANK ( TOWER) located on A.D.O.C. ( EASTERLING CORRECTIONAL FACILITY) property.

12. Please provide proof, that the water tank ( Tower) which is located on A.D.O.C. ( EASTERLING CORRECTIONAL FACILITY) Property IS NOT providing or supplying Water to the prisoners at EASTERLING CORRECTIONAL FACILITY.

13. Please provide proof, as to why the Water that is currently used in the Showers and in the Sinks at EASTERLING CORRECTIONAL FACILITY, feels as though the soap film is still on Prisoners after they rinse off, regardless of how long they rinse off for, when the Water is not like this at other Prisons throughout the State of Alabama.?

DATED: OCTOBER 20, 2005

Respectfully Submitted,

*Charles Anthony Kessler*  
CHARLES ANTHONY KESSLER  
AIS # 127802 Dorm 6-B 108  
EASTERLING CORRECTIONAL FAC.  
200 WALLACE DRIVE  
CLIO, ALABAMA 36017-2615

CERTIFICATE OF SERVICE

I hereby certify that I have enclosed a copy of the foregoing PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS upon the Clerk of the Court for the Middle District of Alabama, along with a copy sent to: MR. TROY KING, ATTORNEY GENERAL, and MR. JEFFERY H. LONG ASSISTANT ATTORNEY GENERAL, at OFFICE OF THE ATTORNEY GENERAL, ALABAMA STATE HOUSE, 11 SOUTH UNION STREET, MONTGOMERY, ALABAMA 36130, by placing same in the United States Mailbox located on EASTERLING CORRECTIONAL FACILITY PROPERTY, with First Class Postage affixed and addressed as above.

Respectfully Submitted

*Charles Anthony Kessler*  
CHARLES ANTHONY KESSLER  
AIS # 127802 Dorm 6-B 108  
EASTERLING CORRECTIONAL FAC.  
200 WALLACE DRIVE  
CLIO, ALABAMA 36017